

LOCAL BANKRUPTCY FORM 9013-3**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****IN RE:**Tara Lynn Shields
a/k/a Tara Grace
Dean S. Shields,**Debtor(s)****CHAPTER** 13
CASE NO. 16-04524-HWV**ADV. NO.** n/a
NATURE OF PROCEEDING: Motion for Relief from Stay
DOCUMENT No. 69**M&T Bank****Plaintiff(s)/
Movants****vs.**Tara Lynn Shields
a/k/a Tara Grace
Dean S. Shields,**Defendant(s)/
Respondent(s)****REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The Debtor has filed opposition to the Motion and was provided a Mortgage Forbearance effective November 1, 2020 for 6 months. Movant respectfully requests for the Motion hearing to be adjourned until May of 2021, with consent of the debtor's counsel.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: December 14, 2020

/s/ Martin A. Mooney
Applicant's Signature

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.